

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**  
*(Trenton Vicinage)*

JOHN CURLEY,

Plaintiff,

**vs.**

MONMOUTH COUNTY BOARD OF CHOSEN  
FREEHOLDERS, SERENA DIMASO, in her individual  
and official capacity as Monmouth County Chosen  
Freeholder, THOMAS A. ARNONE, in his individual and  
official capacity as Monmouth County Chosen Freeholder,  
GARY J. RICH, in his individual and official capacity as  
Monmouth County Chosen Freeholder, LILLIAN G.  
BURRY, in her individual and official capacity as  
Monmouth County Chosen Freeholder, PATRICK  
IMPREVEDUTO, in his individual and official capacity as  
Monmouth County Chosen Freeholder, GERRY P.  
SCHARFENBERGER, in his individual and official  
capacity as Monmouth County Chosen Freeholder,  
MICHAEL FITZGERALD, in his individual and official  
capacity as County Counsel, and TERI O'CONNOR, in her  
individual and official capacity as County Administrator,

Defendants.

C.A. No. 3:17-cv-  
12300-BRM-TJB

RETURN DATE:  
September 16,  
2019

ORAL  
ARGUMENT  
REQUESTED

DEFENDANTS' NOTICE OF MOTION TO STAY EXECUTION ON THE  
JUDGMENT PENDING APPEAL

To: Angelo Joseph Genova  
Lawrence Bluestone  
Genova Burns LLC  
494 Broad Street  
Newark, NJ 07102

To: Bruce P. McMoran  
Michael Francis O'Connor  
McMoran, O'Connor, & Bramley, Pc  
Ramshorn Executive Center  
2399 Highway 34  
Building D, Suite D-1  
Manasquan, NJ 08736

PLEASE TAKE NOTICE that, on September 16, 2019 or as soon thereafter as counsel may be heard, defendants Monmouth County Board of Chosen Freeholders, Serena DiMaso, Thomas A. Arnone, Gary J. Rich and Lillian G. Bury shall move for entry of an order granting defendant's Motion to Stay Execution on the Judgment.

PLEASE TAKE FURTHER NOTICE that defendant relies on the Memorandum of Law submitted herewith.

PLEASE TAKE FURTHER NOTICE that defendant respectfully requests oral argument in the event opposition is filed or this Court is inclined to deny this motion.

***MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN***

By: /s/ Richard L. Goldstein

RICHARD L. GOLDSTEIN, ESQ.

Attorney for Defendants, Monmouth County  
Board of Chosen Freeholders, Serena Dimaso,  
Thomas A. Arnone, Gary J. Rich, Lillian G. Bury,  
Patrick Impeveduto, and Gerry P. Scharfenberger